

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,	:	x
	:	
Plaintiff,	:	
	:	
– against –	:	18 Civ. 8175 (ER)
	:	
BARRY C. HONIG, ROBERT LADD,	:	
ELLIOT MAZA, BRIAN KELLER,	:	
JOHN H. FORD, GRQ CONSULTANTS, INC.	:	
and HS CONTRARIAN INVESTMENTS, LLC,	:	
	:	
Defendants.	:	
	:	

**NOTICE OF PLAINTIFF'S MOTION FOR PARTIAL SUMMARY
JUDGMENT AGAINST DEFENDANT ROBERT LADD**

PLEASE TAKE NOTICE, that upon the Declaration of Nancy Brown, executed January 31, 2023, and the Exhibits thereto, the Declaration of Katherine S. Bromberg, executed January 31, 2023, and the Exhibits thereto, the Declaration of Ricky Tong, executed January 19, 2023, and the Exhibits thereto, the Declaration of Stephen Johnson, executed January 30, 2023, and the Exhibits thereto, the Declaration of Christopher Petranis, executed on January 18, 2023, Plaintiff's Statement of Undisputed Material Facts Pursuant to Local Civil Rule 56.1, Plaintiff's Response to Defendant Ladd's Local Civil Rule 56.1(a) Statement Pursuant to Local Civil Rule 56.1(b), Plaintiff's Memorandum of Law in Support of the Motion, and the prior proceedings had herein, Plaintiff Securities and Exchange Commission ("Commission"), will move this Court, at a date and time to be determined by the Court, before the Honorable Edgardo Ramos, at the Thurgood Marshall United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, for an Order pursuant to Fed. R. Civ. P. 56 granting

partial summary judgment to the Commission as to Counts 5, 6, 11, 13, and 17 of the Second Amended Complaint; and such other and further relief as the Court may deem just and proper.

Dated: January 31, 2023
New York, NY

By: /s/ Nancy A. Brown
Nancy A. Brown
Jack Kaufman
Katherine Bromberg
100 Pearl Street, Suite 20-100
New York, NY 10004-2616
(212) 336-0106 (Kaufman)

Attorneys for Plaintiff